

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

US GHOST ADVENTURES, LLC,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No. <u>1:23-cv-12116</u>
)	
MISS LIZZIE’S COFFEE LLC,)	
)	
)	
and)	
)	
JOSEPH PEREIRA, individually,)	
)	
Defendants.)	
)	

**PLAINTIFF’S MOTION FOR DEFAULT JUDGMENT AGAINST MISS LIZZIE’S
COFFE LLC**

Plaintiff, US Ghost Adventures, LLC (“Plaintiff” or “US Ghost”), by and through its undersigned counsel and hereby moves for entry of default judgment in its favor on all claims asserted in its Complaint (Dkt. 1) against Defendant Miss Lizzie’s Coffee LLC (“Defendant” or “Miss Lizzie’s”) pursuant to Federal Rule of Civil Procedure 55(a), as Miss Lizzie’s can no longer defend against Plaintiff’s claims due to the withdrawal of its counsel, and failure to obtain successor counsel.

In support of this Motion, Plaintiff has offered the Affidavit of Lance Zaal as well as the attached Memorandum in Support of Plaintiff’s Motion for Default Judgment. Plaintiff is not a minor or incompetent pursuant to Fed. R. Civ. P. 55(b)(2). Plaintiff is submitting a Proposed Judgment order for the Court’s consideration.

WHEREFORE, for at least these reasons and those set forth in Plaintiff’s accompanying Memorandum, Plaintiff respectfully requests that the Court enter an order granting Plaintiff the requested relief in the Proposed Judgment, attached to Plaintiff’s Memorandum as **Exhibit A**.

Dated: October 8, 2025

Respectfully Submitted,

Plaintiff
US GHOST ADVENTURES LLC

By its attorneys,

/s/ Mikaela R. DeCortin
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Counsel for Plaintiffs

RULE 7.1 CERTIFICATION

Counsel for Plaintiff could not confer with counsel for Defendant, Miss Lizzie's Coffee,
as it is an unrepresented business entity.

/s/ Mikaela R. DeCortin
Mikaela R. DeCortin

CERTIFICATE OF SERVICE

I hereby certify that this document(s) filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those parties which are non-registered participants.

Date: October 8, 2025

/s/ Mikaela R. DeCortin
Mikaela R. DeCortin